

***IN THE DISTRICT COURT OF THE UNITED STATES***

***for the Western District of New York***

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**October 2018 GRAND JURY  
(Impaneled October 24, 2018)**

**THE UNITED STATES OF AMERICA**

**INDICTMENT**

**-vs-**

**Violations:**

**RICHARD DZIONARA-NORSEN**

Title 18, United States Code,  
Sections 2252A(a)(2)(A),  
2252A(a)(5)(B), 2252A(b)(1) and  
2252A(b)(2).  
(3 Counts and Forfeiture Allegation)

**COUNT 1**

**(Distribution and Attempted Distribution of Child Pornography)**

**The Grand Jury Charges That:**

On or about March 13, 2018, in the Western District of New York, and elsewhere, the defendant, RICHARD DZIONARA-NORSEN, did knowingly distribute, and attempt to distribute, child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(b)(1).**

**COUNT 2**  
**(Receipt and Attempted Receipt of Child Pornography)**

**The Grand Jury Further Charges That:**

Between in or about 2016 and on or about June 13, 2018, the exact dates being unknown, in the Western District of New York, and elsewhere, the defendant, RICHARD DZIONARA-NORSEN, did knowingly receive, and attempt to receive, child pornography as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(b)(1).**

**COUNT 3**  
**(Possession and Attempted Possession of Child Pornography)**

**The Grand Jury Further Charges That:**

Between in or about 2016 and on or about June 13, 2018, the exact dates being unknown, in the Western District of New York, and elsewhere, the defendant, RICHARD DZIONARA-NORSEN, did knowingly possess and access with intent to view, and attempt to possess and access with intent to view, material, that is, a Dell XPS laptop computer with serial number 86NW362, and a Western Digital Hard Drive with serial number WCC1S4264693, that contained images of child pornography, as defined in Title 18, United

States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce; that had been shipped and transported in and affecting interstate and foreign commerce, by any means, including by computer; and that had been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).**

**FORFEITURE ALLEGATION**

**The Grand Jury Alleges That:**

Upon conviction of any of the offenses alleged in this Indictment, the defendant, RICHARD DZIONARA-NORSEN, shall forfeit to the United States any visual depiction described in Title 18, United States Code, Section 2252A, or any property which contains any such visual depiction, and any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, and all property traceable to such property, including but not limited to the following:

- a. One Dell XPS laptop computer with serial number 86NW362; and
- b. One Western Digital Hard Drive with serial number WCC1S4264693.

**All pursuant to Title 18, United States Code, Sections 2253(a)(1) and 2253(a)(3).**

DATED: Rochester, New York, August 8, 2019.

JAMES P. KENNEDY, JR.  
United States Attorney

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A TRUE BILL:

s/FOREPERSON